

REMARKS

Claims 1, 11, 21, 31, 38, 40, 47-49 and 51-81 have been cancelled. Claims 2-10, 13, 17, 22-30, 32-34, 39, 41-43 and 50 have been amended. New claims 82-97 have been added. Accordingly, Claims 2-10, 13, 17, 22-30, 32-34, 39, 41-43, 50, and 82-97 are pending in the application. Reconsideration of the claims as added and amended is respectfully requested.

On the merits, Claims 1-11, 13, 17, 21-34, 38-43, 47-55, 57-60, 62-65 and 71-81 stand rejected under 35 U.S.C. Section 103(a) as unpatentable over Schutzer in view of Kolling et al. For the sake of clarity, Claims 1-46 and 48-81 were rejected by the Examiner. However, only Claims 1-11, 13, 17, 21-34, 38-43, 47-55, 57-60, 62-65 and 71-81 were pending in the application at the time of the rejection.

The foregoing amendment presents new independent Claims 82 and 88. Dependent claims 2-10, 13, 17, 22-30, 32-34, 39, 41-43 and 50 have been amended to depend from these two new independent claims, either directly or indirectly. The remaining independent and dependent claims pending in the application have been cancelled by the foregoing amendment.

New independent claim 82 is drawn to a bill presentment and payment system adapted to receive billing data from a plurality of billers in a plurality of different billing data forms, in which a parsing functionality is used to transform

such billing data in different forms into a common document model wherein all of the billing data has the same form, wherein the transformed billing data is stored in a database and such transformed billing data is retrieved from the database to be output to bill payers, and in which the plurality of billers are allowed to retrieve, review, and alter the transformed billing data in the database. New independent claim 88 is a method claim corresponding to new apparatus claim 82.

In the following remarks, Applicants will show that the present invention provides an adaptive and dynamic common document model for electronic bill presentment and payment in which a biller may maintain control over the biller's billing data after the data has been transformed from the format in which it was provided by the biller into a common document format

Briefly, the present invention provides an electronic bill presentment and payment (EBPP) system which provides a common document model, allowing a plurality of billers to interface with the system of the present invention to cooperatively present and accept payment of bills. The present invention parses the biller's data stream into a common document model. The transformed data are stored in the database. The use of the common format document model and the universality of its structure allows the plurality of billers using the present invention to maintain control, from a biller interactivity functionality, over their billing data and how it is presented on any desired platform using any desired applications, formats and protocols. In other words, the present invention can

accommodate individual data sets from, for example, both a first and second biller without mandating a particular template (for the billers to follow) for both billers.

Essentially, Applicants' common model document processing functionality provides for a generic conversion process that is not confined to a particular industry, biller, or type of customer. Thus, the present invention provides for dynamic structural processing and conversion of a plurality of bill data types.

Schutzer discloses a method and system for presentment of bills wherein the biller account automatically formats a bill to conform to standard bill definition language for a consumer and automatically stores the formatted bill in a storage location, such as a commerce document server (CDS) (see Schutzer Abstract and Figs. 1-7). More specifically, a bill service provider (BSP) formats the bill and places the bill directly in the biller's mailbox for electronic mailing. Then, a consumer service provider (CSP) accesses the electronic bill produced by the bill service provider, along with other bills for the consumer, stores the bill(s), and presents the bill(s) to the consumer. Schutzer, therefore, provides a method and system that enables a plurality of inter-related entities and applications to interact with each other to provide electronic bill presentment and payment. Billing information are transferred from the billers to a BSP, from the BSP to a CDS, from the CDS to a CSP, and then finally from the CSP to the consumer. These separate entities and applications are authenticated by another entity, the certificate authority (see Schutzer Figs. 1-7). As can be seen, the billing

information is routed through multiple applications and entities before it is finally presented to the consumer. In addition, because of the limitation with coordinating interactions between multiple entities and applications, Schutzer provides a system in which incoming billing data is processed without transformation before it is presented to the consumer. Schutzer, in fact, formats the bills into a standard bill definition language to prepare it for routing through multiple entities and applications.

Kolling et al. disclose an electronic statement presentment (ESP) template system to replace the preparation and mailing of paper statements. The system disclosed by Kolling et al. works exclusively with billers that have electronic delivery capabilities and, using statement data received electronically from a biller and a "stored" template, creates an electronic statement having the "look and feel" of a paper statement by making available a plurality of templates. More specifically, the system of Kolling et al. allows billers to control the "look and feel" of bill statements through the use of a statement template (see Kolling et al., column 17, lines 58-60). A parsing program is disclosed to convert statement augment record (SAR) data to statement content record (SCR) data. The SCR "is in a standard form expected by the ESP system and by the template" (emphasis added) (see Kolling et al., column 28, lines 52-54). Thus, Kolling et al. disclose a billing system implementing static data structure. The biller essentially generates bill statement according to a static format/template created by the biller. In fact,

Kolling et al. clearly disclose creating "**a template of static biller information** to serve as a basis for the electronic statement" (emphasis added) (see Kolling et al., Abstract).

With respect to independent Claims 82 and 88, the Examiner concedes that Schutzer does not teach the parsing/extracting functionality and the common model document element and cites the teachings of Kolling et al. to cure this deficiency of Schutzer.

Applicants' common document model processing functionality provides a generic conversion process that is "not confined to a particular industry, biller, or type of customer" (see Applicants' Specification, page 9, lines 3-5) and accepts biller data in a variety of different forms from a plurality of different billers. Fundamentally, the common model processing allows the present invention to aggregate its fields of data to accommodate bills from any biller or type of customer (see Applicants' Specification, page 28, lines 9-17). *For example, a first biller may require one particular subset of data while a second biller may require a similar subset data in additional to another subset of data that is substantially different from that of the first biller.* Using the common model processing, the present invention can accommodate the individual data sets for both the first and second biller's without mandating a particular template for both billers. Therefore, billers retain autonomy on how they collect, group, display, and present their billing information. In short, Applicants' common document model processing

functionality solves the problem associated with multiple billers having and requiring different information by accepting any subset of any data from any biller.

Schutzer discloses that the bill service provider converts the bill, along with enclosures, to a standard bill definition language (see Schutzer column 14, lines 32-35). "The standard bill definition language is an extension of hypertext markup language/extended markup language that allows for combining templates with data and taking digital signatures" (see Schutzer, column 14, lines 35-38). In other words, Schutzer's standard definition format merely provides instructions for formatting the bills uniformly based on pre-determined templates. Therefore, as can be seen, Schutzer does not disclose a parsing functionality for parsing data into a common document model.

Kolling et al. do not cure the deficiencies of Schutzer. Kolling et al. do not parse billing data from a plurality of billers corresponding a plurality of biller data types and does not convert said plurality of biller data types in to a common document model. As previously discussed above, the parsing program of Kolling et al. converts statement augment record (SAR) data to statement content record (SCR) data in which the SCR is in a standard form expected by the ESP system and by the template. The system of Kolling et al. is not adaptive but rather is highly dependent on pre-defined static templates. Thus, Kolling et al. do not disclose or suggest a parsing functionality and a common document model that

allows a plurality of billers to cooperatively present and accept payment of bills using a common document model.

The dependent claims pending in the present invention include additional features that further distinguish these claims from the cited references.

Dependent claims 85 and 91, which depend, indirectly, from independent claims 82 and 88, respectively, feature parsing the billing data received from a plurality of different billers in a plurality of different forms using a rules of conversion defined using a uniform rules definition language. (See, e.g., the application specification at pages 26 and 27.) It is respectfully submitted that neither of the cited references describe or suggest a rules based process defined using a uniform rules definition process to parse biller billing data in a plurality of different forms.

Neither Schutzer nor Kolling et al. teach or suggest the parsing functionality, and thus do not teach or suggest rules of conversion defined using a uniform rules definition language. Schutzer merely formats the bill and routes it to the consumer. Similarly, the ESP system of Kolling et al. merely provides a static data structure that is limited by the templates. Kolling et al. do not "operate" on the biller data and do not parse the biller data into a common document model.

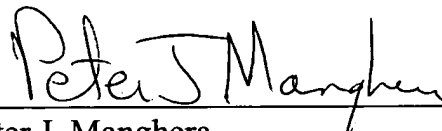
Dependent Claim 95 further distinguishes over Schutzer and Kolling et al. by reciting a biller interactivity functionality coupled to the database adapted to allow the plurality of billers to identify market segments of said bill payers

according to market rules and information retrieved from said database. There is no mention of the billers being able to identify market segments of bill payers in the Schutzer patent. Kolling et al. do not mention a biller interactivity functionality as recited in Claim 95 either. Kolling et al. do not disclose or suggest allowing the biller to identify market segments with the biller interface. Thus, it is respectfully submitted that new claim 95 and the claims that depend therefrom are allowable over the cited references for this additional reason.

The Examiner failed to cite or provide any evidence for the anticipation, teaching, or suggestion of a modularized input processing engine, as recited in dependent Claim 97. The advantage of using a modularized processing engine is that this facilitates scalability and expandability. For example, if a new form of biller data is encountered or must be dealt with for transformation into a form and format, the modularized input processing engine of Claim 97 allows for the processing of the new biller data in a modular way (see Applicants' Specification, page 25, lines 17-19). There may be separate engines for each new form of data so that the output of each preprocessing engine is ready for processing by a rule-based parsing engine. In other words, because the preprocessing of biller data is modularized, a new input processing engine can easily be integrated to handle new data types. Therefore, Claim 97 is believed to be patentable for the additional reasons provided.

In summary, Claims 2-10, 13, 17, 22-30, 32-34, 39, 41-43, 50, and 82-97 are believed to be allowable for the reasons given herein. Accordingly, these claims remain pending following entry of this Amendment, and are in condition for allowance at this time. As such, Applicants respectfully request entry of the present Amendment and reconsideration of the application, with an early and favorable decision being solicited. Should the Examiner believe that the prosecution of the application could be expedited, the Examiner is requested to call Applicants' undersigned representative at the number listed below.

Respectfully submitted,
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